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Attorney for Plaintiff  
Tahoe Regional Planning Agency

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

TAHOE REGIONAL PLANNING AGENCY, ) Case No. 2:21-CV-02243-TLN-CKD

Plaintiff, )

vs. )

JACOB PARKER, )

Defendant. )

**REQUEST AND PROPOSED ORDER  
UNDER FRCP 6(b)(1)(A) AND LR 144(b)  
TO EXTEND TIME TO RESPOND  
MINUTE ORDER**

Plaintiff, Tahoe Regional Planning Agency (“TRPA”), through their counsel, requests an extension of time to respond to the Court’s September 27, 2022 Minute Order (Dkt. 14) under Federal Rules of Civil Procedure (“FRCP”) 6(b)(1)(A) and Local Rule 144(b) and based on the following events and good cause shown.:

1. This action was commenced on December 6, 2021 (Dkt. 1).
2. On January 31, 2022, Defendant was served with the Amended Summons (Dkt. 6) and Complaint (Dkt. 1) by leaving copies with a competent member of the household at the dwelling house or usual place of abode by the process server (Dkt. 8).

3. On May 13, 2022, after no Answer or responsive pleading was filed by the Defendant, Plaintiff applied for Clerk's Entry of Default (Dkt. 9) which application was granted on May 16, 2022 (Dkt. 10).
4. Defendant subsequently made notice to this Court that he had not received notification of the previous Service (Dkt. 11) and the Plaintiff was ordered by the Court to re-serve the Defendant (Dkt. 12). Plaintiff re-served Defendant successfully on May 31, 2022 (Dkt. 13).
5. No Answer to the complaint or responsive pleading has been filed by the Defendant and no request for a default judgement has been made by the Plaintiff.
6. The parties have been engaged in productive settlement negotiations.
7. Plaintiff has sent the Defendant a proposed settlement agreement to execute to which the Defendant's counsel indicate his client is amenable. However, Defendant's counsel informed Plaintiffs that they are out of the country until October 23, 2022 and unable to complete the transaction before that time.
8. Plaintiff has not requested any other extensions regarding this matter.

With good cause shown, Plaintiff requests under FRCP 6(b)(1)(A) and under Local Rule 144 that the Plaintiff's deadline to respond to Docket 14 be extended to October 28, 2022.

DATED: October 11, 2022.

TAHOE REGIONAL PLANNING AGENCY

By: /s/ John L. Marshall  
JOHN L. MARSHALL  
Attorney for Plaintiff,  
Tahoe Regional Planning Agency  
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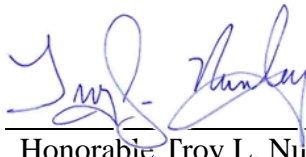
**PROPOSED ORDER**

Pursuant to stipulation of the parties, and good cause being shown, it is hereby  
ORDERED and ADJUDGED that:

1. Plaintiff shall have until October 28, 2022 to respond to Docket 14.

IT IS SO ORDERED.

Dated: October 12, 2022



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Honorable Troy L. Nunley  
United States District Judge

PROOF OF SERVICE

I declare that I am over the age of eighteen years and not a party to this action. I am employed by the Tahoe Regional Planning Agency, and my business address is 128 Market Street, Stateline, Nevada.

On October 11, 2022, at Stateline, Nevada I caused the following document(s) to be served:

REQUEST AND PROPOSED ORDER UNDER FRCP 6 AND LOCAL RULE 144 TO  
EXTEND DATE TO RESPOND TO DOCKET 14 MINUTE ORDER TO OCTOBER 28, 2022

on:

Jacob Parker  
3381 Red Lake Road  
South Lake Tahoe, CA 96150  
[jake@lhtahoe.com](mailto:jake@lhtahoe.com)

AND

Joe Laub  
Laub & Laub Law Firm  
1148 Ski Run Blvd.  
South Lake Tahoe, CA 96150  
[joe@lawlaub.com](mailto:joe@lawlaub.com)

☒ BY FIRST CLASS MAIL: On the date written above, I deposited with the United States Postal Service a true copy of the attached document in a sealed envelope, with postage fully prepaid, addressed as shown on the service list. I am aware that on motion of the party served, service is presumed invalid if the postal cancellation date or postage meter date is more than one day after the date of deposit for mailing contained in this declaration.

☒ BY ELECTRONIC MAIL: On the date written above, I sent the above listed documents as PDF attachments to [jake@lhtahoe.com](mailto:jake@lhtahoe.com) and [joe@lawlaw.com](mailto:joe@lawlaw.com).

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this document was executed on October 11, 2022 at Stateline, Nevada.

Katherine Huston